## **Exhibit C**

Table of Disputed Protective Order Provisions

## Oracle's Proposal

¶ 7.3 Disclosure of "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" and "HIGHLY CONFIDENTIAL – SOURCE CODE" Information or Items.

Unless otherwise ordered by the court or permitted in writing by the Designating Party, a Receiving Party may disclose any information or item designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" or "HIGHLY CONFIDENTIAL – SOURCE CODE" only to:

- (a) the Receiving Party's Outside
  Counsel of Record in this action, as well as
  employees of said Outside Counsel of
  Record to whom it is reasonably necessary
  to disclose the information for this
  litigation and who have signed the
  "Acknowledgment and Agreement to Be
  Bound" that is attached hereto as Exhibit
  A;
- (b) Up to five (5) Designated House Counsel of the Receiving Party to whom disclosure is reasonably necessary for this litigation, who has signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A), and as to whom the procedures set forth in paragraph 7.4(a)(1), below, have been followed;
- (c) Experts of the Receiving Party (1) to whom disclosure is reasonably necessary for this litigation, (2) who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A), and (3) as to whom the procedures set forth in paragraph 7.4(a)(2), below, have been followed;

## Google's Proposal

¶ 7.3 Disclosure of "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" and "HIGHLY CONFIDENTIAL – SOURCE CODE" Information or Items.

Unless otherwise ordered by the court or permitted in writing by the Designating Party, a Receiving Party may disclose any information or item designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" or "HIGHLY CONFIDENTIAL – SOURCE CODE" only to:

- (a) the Receiving Party's Outside Counsel of Record in this action, as well as employees of said Outside Counsel of Record to whom it is reasonably necessary to disclose the information for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" that is attached hereto as Exhibit A;
- (b) Experts of the Receiving Party (1) to whom disclosure is reasonably necessary for this litigation, (2) who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A), and (3) as to whom the procedures set forth in paragraph 7.4(a)(2), below, have been followed;

. . . .

[Google's proposal also omits attendant material to Oracle's proposed 7.3(b), such as the definition of Designated House Counsel, references to Designated House Counsel throughout, and the provision involving objecting to disclosure of Highly Confidential – Attorneys Eyes Only material to Designated House Counsel.]

| Oracle's Proposal                           | Google's Proposal                                   |
|---|---|
| [Plaintiff's proposal does not include this | 8. PROSECUTION BAR                                  |
| provision]                                  |   |
|   | Absent written consent from the Producing           |
|   | Party, any individual who receives access to        |
|   | "HIGHLY CONFIDENTIAL – ATTORNEYS"                   |
|   | EYES ONLY" or "HIGHLY CONFIDENTIAL                  |
|   | – SOURCE CODE" information shall not be             |
|   | involved in the prosecution of patents or patent    |
|   | applications relating to Java, Android, mobile      |
|   | platforms and devices, or virtual machines,         |
|   | including without limitation the patents asserted   |
|   | in this action and any patent or application        |
|   | claiming priority to or otherwise related to the    |
|   | patents asserted in this action, before any foreign |
|   | or domestic agency, including the United States     |
|   | Patent and Trademark Office ("the Patent            |
|   | Office"). For purposes of this paragraph,           |
|   | "prosecution" includes directly or indirectly       |
|   | drafting, amending, advising, or otherwise          |
|   | affecting the scope or maintenance of patent        |
|   | claims. To avoid any doubt, "prosecution" as        |
|   | used in this paragraph does not include             |
|   | representing a party challenging a patent before    |
|   | a domestic or foreign agency (including, but not    |
|   | limited to, a reissue protest, ex parte             |
|   | reexamination or inter partes reexamination).       |
|   | This Prosecution Bar shall begin when access to     |
|   | "HIGHLY CONFIDENTIAL – ATTORNEYS"                   |
|   | EYES ONLY" or "HIGHLY CONFIDENTIAL                  |
|   | – SOURCE CODE" information is first received        |
|   | by the affected individual and shall end two (2)    |
|   | years after final termination of this action.       |